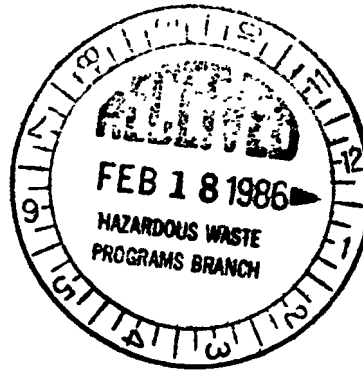


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FEB 14 1986

Mr. Don Hensch, Director  
Industrial Waste Division  
Waste Management Service  
Oklahoma State Department of Health  
P.O. Box 53551  
Oklahoma City, Oklahoma 73152



Re: Turner Brothers Trucking Company  
RCRA Docket No. VI-505-H

OKD 1044850524

Dear Mr. Hensch:

Please find enclosed our comments regarding the closure plan submitted by Turner Brothers Trucking Company. The closure plan is deficient with respect to some of the Federal RCRA requirements. These deficiencies are listed below.

The closure plan lacks the following:

1. A cost estimate for closure activities.
2. A description of soils and geologic profile.
3. No closure plan is kept at the facility.
4. The plan has no provisions or discussion on the control of migration of hazardous wastes and constituents to the groundwater.
5. The mobility and rate of migration of hazardous waste is not addressed.
6. The climate of the area (including precipitation) is not addressed.
7. The surface and subsurface hydrology is not sufficiently addressed.
8. The plan has no provisions for unsaturated zone monitoring.
9. The type, concentration and depth of hazardous constituent migration is not compared to background levels for the site.
10. The plan has no estimate of the number of inspections for certification.
11. The plan has no provisions for clean-up of ponds if the sample results show metal content above background.

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12. The plan has no description of the type of sampling that will be done on the newly exposed soil after the initial layer of contaminated soil is removed, to determine if all contaminants have been removed.
13. The cleanup will be to background levels unless an ACL is proposed and approved. An EP Toxicity test is not sufficient.
14. No maximum inventory of wastes.

The Sampling plan needs the following:

1. Sample for background levels of metals and other appropriate constituents. These samples will come from an area on the site that is not affected by the run-off from the test rack areas. Samples will be taken by the procedures listed in No. 5 below. One such location may be the southeast corner of Turner Brothers' property at an elevation of 1200 feet.
2. A description of the representative soils to be encountered by the sampling. Include a description of the soil's affinity for metals.
3. A drawing of each test rack area to be sampled. Include on the drawing these items: (A) the racks and all their components; (B) any "traffic areas" where pipes are dragged in and out of the area; (C) general surface contours; and (D) direction of surface run-off.
4. On each of the drawings in No. 3 above, delineate appropriate sample locations to be taken directly beneath the pipe overhang and in the general direction of surface run-off.
5. Soil samples will be tested for total metals and other appropriate parameters. Samples will be taken with a Shelby Tube, split spoon or other device which will allow for undisturbed soil core recovery. Samples should be of sufficient diameter to provide adequate soil for testing. Samples will be obtained to a depth of 18 inches. The sample will be divided into 0-6", 6"-12", and 12"-18" intervals. The 0-6" and 6"-12" samples will be analyzed for the above-mentioned parameters. In the case where the 6"-12" sample shows metal content above background, the 12"-18" sample will be analyzed for the same parameters.
6. Analytical results will be submitted to the State and EPA before the closure plan can be reviewed for approval.
7. Plans for groundwater monitoring will be adjusted based on analytical results and the extent/depth of contamination.

These deficiencies should be addressed before the closure plan can be considered complete. If you have any questions regarding these comments, please contact me or have your staff contact Beth Pinter at (214) 767-2852 or Samuel Yates at (214) 767-0801.

Sincerely yours,

*William H. Taylor, Jr.*

William H. Taylor, Jr., Chief  
Enforcement Section

cc: Mr. Gary Ritzky  
Personnel and Safety Manager  
Turner Brothers Trucking Company  
4725 North Boulevard  
Edmond, Oklahoma 73034

Joseph F. Guida, Esquire  
Gardere & Wynne  
1500 Diamond Shamrock Tower  
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bcc: Enforcement file  
A. Banks (6H-CE)  
—> G. Peiter (CI-PD)